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4 Attorneys for Plaintiff,
CARLA PAGLIA
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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF
LOS ANGELES

BY _____

6 UNITED STATES DISTRICT COURT
7 CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

8 CARLA PAGLIA,
9 Plaintiff,
10 v.
11 WEST ASSET MANAGEMENT,
12 INC.
13 Defendant.

} Case No. LACV 11-6714SS
COMPLAINT AND DEMAND FOR
JURY TRIAL
(Unlawful Debt Collection Practices)

15 **VERIFIED COMPLAINT**

16 CARLA PAGLIA (Plaintiff), by her attorneys, KROHN & MOSS, LTD.,
17 alleges the following against WEST ASSET MANAGEMENT, INC. (Defendant):

18 **INTRODUCTION**

- 19 1. Count I of Plaintiff's Complaint is based on the Fair Debt Collection
20 Practices Act, *15 U.S.C. 1692 et seq.* (FDCPA).
21 2. Count II of the Plaintiff's Complaint is based on Rosenthal Fair Debt
Collection Practices Act, *Cal. Civ. Code §1788 et seq.* (RFDCPA).

22 **JURISDICTION AND VENUE**

- 23 3. Jurisdiction of this court arises pursuant to *15 U.S.C. 1692k(d)*, which states
24 that such actions may be brought and heard before "any appropriate United

1 States district court without regard to the amount in controversy," and 28
2 U.S.C. 1367 grants this court supplemental jurisdiction over the state claims
3 contained therein.

- 4 4. Defendant conducts business in the state of California, and therefore,
5 personal jurisdiction is established.
6 5. Venue is proper pursuant to 28 U.S.C. 1391(b)(2).

7 **PARTIES**

- 8 6. Plaintiff is a natural person residing in Palmdale, Los Angeles County,
9 California.
10 7. Plaintiff is a consumer as that term is defined by 15 U.S.C. 1692a(3), and
11 according to Defendant, Plaintiff allegedly owes a debt as that term is
12 defined by 15 U.S.C. 1692a(5) and Cal. Civ. Code § 1788.2(h).
13 8. Defendant is a debt collector as that term is defined by 15 U.S.C. 1692a(6)
14 and Cal. Civ. Code § 1788.2(c), and sought to collect a consumer debt from
15 Plaintiff.
16 9. Defendant is a national company with its headquarters in San Antonio,
17 Texas.
18 10. Defendant acted through its agents, employees, officers, members, directors,
19 heirs, successors, assigns, principals, trustees, sureties, subrogees,
20 representatives, and insurers.

21 **FACTUAL ALLEGATIONS**

- 22 11. Defendant constantly and continuously placed collection calls to Plaintiff
23 seeking and demanding payment for an alleged debt.
24 12. Defendant has been calling Plaintiff since June 2010 and calls Plaintiff from

1 two (2) to three (3) times a day.

2 13. Defendant occasionally calls Plaintiff back to back if she does not answer.

3 14. Defendant calls Plaintiff on her cellular telephone number at 661-435-5535
4 and on her work telephone number at 661-265-8491.

5 15. Defendant calls Plaintiff from 415-375-0946.

6 **COUNT I**

7 **DEFENDANT VIOLATED THE FAIR DEBT COLLECTION PRACTICES
ACT**

8 16. Defendant violated the FDCPA based on the following:

- 9 a. Defendant violated §1692d of the FDCPA by engaging in conduct of
10 which the natural result is the abuse and harassment of the Plaintiff.
11 b. Defendant violated §1692d(5) of the FDCPA by causing a telephone
12 to ring repeatedly and continuously with the intent to annoy, abuse,
13 and harass Plaintiff.

14 WHEREFORE, Plaintiff, CARLA PAGLIA, respectfully requests judgment
15 be entered against Defendant, WEST ASSET MANAGEMENT, INC. for the
16 following:

17 17. Statutory damages of \$1,000 pursuant to the Fair Debt Collection Practices
18 Act, 15 U.S.C. 1692k,

19 18. Costs and reasonable attorneys' fees pursuant to the Fair Debt Collection
20 Practices Act, 15 U.S.C. 1692k

21 19. Any other relief that this Honorable Court deems appropriate.

22 **COUNT II**

23 **DEFENDANT VIOLATED THE ROSENTHAL FAIR DEBT
COLLECTION PRACTICES ACT**

25 20. Plaintiff repeats and realleges all of the allegations in Count I of Plaintiff's

Complaint as the allegations in Count II of Plaintiff's Complaint.

21. Defendant violated the RFDCPA based on the following:

- a. Defendant violated §1788.11(d) of the RFDCPA by causing Plaintiff's telephone to ring repeatedly and continuously so as to annoy Plaintiff.
 - b. Defendant violated §1788.11(e) of the RFDCPA by placing collection calls to Plaintiff with such frequency that was unreasonable and constituted harassment.
 - c. Defendant violated the §1788.17 of the RFDCPA by continuously failing to comply with the statutory regulations contained within the FDCPA, 15 U.S.C. § 1692 et seq.

WHEREFORE, Plaintiff, CARLA PAGLIA, respectfully requests judgment be entered against Defendant, WEST ASSET MANAGEMENT, INC. for the following:

22. Statutory damages of \$1,000 pursuant to the Rosenthal Fair Debt Collection Practices Act, *Cal. Civ. Code §1788.30(b)*,
23. Costs and reasonable attorneys' fees pursuant to the Rosenthal Fair Debt Collection Practices Act, *Cal. Civ. Code § 1788.30(c)*, and
24. Any other relief that this Honorable Court deems appropriate.

DEMAND FOR JURY TRIAL

PLEASE TAKE NOTICE that Plaintiff, CARLA PAGLIA, demands a jury trial in this case.

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4 RESPECTFULLY SUBMITTED,
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6 DATED: August 12, 2011 KROHN & MOSS, LTD.
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8 By: 
9 Nicholas J. Bontrager
10 Attorney for Plaintiff
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2 **VERIFICATION OF COMPLAINT AND CERTIFICATION**

3 STATE OF CALIFORNIA

4 Plaintiff, CARLA PAGLIA, states as follows:

- 5 1. I am the Plaintiff in this civil proceeding.
6 2. I have read the above-entitled civil Complaint prepared by my attorneys
7 and I believe that all of the facts contained in it are true, to the best of my
knowledge, information and belief formed after reasonable inquiry.
8 3. I believe that this civil Complaint is well grounded in fact and warranted
by existing law or by a good faith argument for the extension,
modification or reversal of existing law.
9 4. I believe that this civil Complaint is not interposed for any improper
purpose, such as to harass any Defendant(s), cause unnecessary delay to
any Defendant(s), or create a needless increase in the cost of litigation to
any Defendant(s), named in the Complaint.
10 5. I have filed this Complaint in good faith and solely for the purposes set
forth in it.

12 Pursuant to 28 U.S.C. § 1746(2), I, CARLA PAGLIA, hereby declare (or
13 certify, verify or state) under penalty of perjury that the foregoing is true and
correct.

14 DATE: 7. 19. 11



15 CARLA PAGLIA

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE TO COUNSEL

(For use in Direct Assignment of Civil Cases to Magistrate Judges Program only)

The court has directed that the following rules be specifically called to your attention:

- I. Notice of Right to Consent to Disposition of a Civil Case by a United States Magistrate Judge [28 U.S.C. § 636(c)]
- II. Continuing Obligation to Report Related Cases (Local Rule 83-1.3.3)
- III. Service of Papers and Process (Local Rule 4)

I. NOTICE OF RIGHT TO CONSENT TO DISPOSITION OF A CIVIL CASE BY A UNITED STATES MAGISTRATE

Pursuant to Local Rule 73-2, the initiating party must serve this notice and consent form CV-11C on each party at the time of service of the summons and complaint or other initial pleading.

This case has been randomly assigned to Magistrate Judge SEAGAL under the Direct Assignment of Civil Cases to Magistrate Judges Program in accordance with Local Rule 73. The case number on all documents filed with the court must read as follows: LACV11-6714

The parties are advised that their consent is required if the above assigned magistrate judge is to conduct all further proceedings in the case, including trial and final entry of judgment pursuant to 28 U.S.C. § 636(c) and Federal Rule of Civil Procedure 73. Should the parties not consent to proceed before the above assigned magistrate judge, the case will be randomly reassigned to a district judge. If this occurs, the parties cannot later consent to reassignment of the case to any other magistrate judge.

The parties are further advised that they are free to withhold consent without adverse substantive consequences. If the parties agree to the exercise of jurisdiction by the magistrate judge, the parties shall jointly or separately file a statement of consent setting forth such election. Except as provided in Local Rule 73-2.4.1.1, for cases originally filed in district court and initially assigned only to a magistrate judge, the statement of consent shall be filed within 42 days after service of the summons and complaint upon that defendant, and within 42 days by plaintiff after service upon the first-served defendant. If the United States, an agency of the United States, or an officer or employee of the United States is a defendant, the statement of consent shall be filed by the government defendant within 60 days after service of the summons and complaint upon that defendant.

For cases removed from state court and initially assigned only to a magistrate judge, a joint or separate statements of consent shall be filed by plaintiff and all defendants upon whom service has been effected, within 14 days after the notice of removal is filed.

Since magistrate judges do not handle felony criminal trials, civil trial dates are not at risk of being preempted by a felony criminal trial, which normally has priority. Further, in some cases, the magistrate judge may be able to assign an earlier trial date than a district judge. There may be other advantages or disadvantages which you will want to consider.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CARLA PAGLIA v. WEST ASSET MANAGEMENT, INC.	PLAINTIFF(S) DEFENDANT(S).
CASE NUMBER LACV11-6714SS SUMMONS	

TO: DEFENDANT(S): WEST ASSET MANAGEMENT, INC.

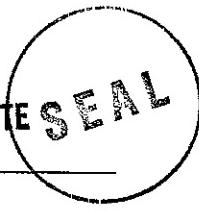
A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached complaint amended complaint counterclaim cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Nicholas J. Bontrager, Esq., whose address is Krohn & Moss, Ltd.; 10474 Santa Monica Blvd., Suite 401; Los Angeles, CA 90025. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Dated: AUG 16 2011

Clerk, U.S. District Court

By: _____

SUSANA P. BUSTAMANTE 

Deputy Clerk

(*Seal of the Court*)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3).]

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

<p>I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/> CARLA PAGLIA</p>		<p>DEFENDANTS WEST ASSET MANAGEMENT, INC</p>																																											
<p>(b) Attorneys (Firm Name Address and Telephone Number If you are representing yourself, provide same) Krohn & Moss, Ltd ; Nicholas J. Bontrager, Esq. 10474 Santa Monica Blvd , Suite 401, Los Angeles, CA 90025 (323) 988-2400</p>		<p>Attorneys (If Known)</p>																																											
<p>II. BASIS OF JURISDICTION (Place an X in one box only)</p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)</p> <p><input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)</p>		<p>III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant)</p> <table> <tr> <td>Citizen of This State</td> <td><input type="checkbox"/> PIF</td> <td><input type="checkbox"/> DEF</td> <td><input type="checkbox"/> PIF</td> <td><input type="checkbox"/> DEF</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 1</td> <td><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td><input type="checkbox"/> 4</td> <td><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td><input type="checkbox"/> 5</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td></td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> </table>		Citizen of This State	<input type="checkbox"/> PIF	<input type="checkbox"/> DEF	<input type="checkbox"/> PIF	<input type="checkbox"/> DEF	Citizen of Another State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5		<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																			
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<p>IV. ORIGIN (Place an X in one box only)</p> <p><input checked="" type="checkbox"/> 1 Original Proceeding <input type="checkbox"/> 2 Removed from State Court <input type="checkbox"/> 3 Remanded from Appellate Court <input type="checkbox"/> 4 Reinstated or Reopened <input type="checkbox"/> 5 Transferred from another district (specify): _____</p>		<p><input type="checkbox"/> 6 Multi-District Litigation <input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judge</p>																																											
<p>V. REQUESTED IN COMPLAINT: <input checked="" type="checkbox"/> JURY DEMAND: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Check 'Yes' only if demanded in complaint)</p> <p>CLASS ACTION under F.R.C.P. 23: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>		<p><input type="checkbox"/> MONEY DEMANDED IN COMPLAINT: \$ _____</p>																																											
<p>VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause Do not cite jurisdictional statutes unless diversity) 15 USC 1692 et seq.; Unlawful and Abusive Debt Collection Practices</p>		<p>VII. NATURE OF SUIT (Place an X in one box only)</p> <table border="1"> <tr> <td>OTHER STATUTES</td> <td>CONTRACT</td> <td>TORTS</td> <td>TORTS</td> <td>PRISONER PETITIONS</td> <td>LABOR</td> </tr> <tr> <td> <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/ Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes </td> <td> <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise </td> <td> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. 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<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/ Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/ Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt Relations <input type="checkbox"/> 730 Labor/Mgmt Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl Ret Inc Security Act																																								
REAL PROPERTY	REAL PROPERTY	IMMIGRATION	CIVIL RIGHTS	FORECLOSURE / PENALTY	PROPERTY RIGHTS																																								
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark																																								
SOCIAL SECURITY	FEDERAL TAX SUITS	FEDERAL TAX SUITS	SOCIAL SECURITY	FEDERAL TAX SUITS	FEDERAL TAX SUITS																																								
					<input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))																																								
					<input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609																																								

FOR OFFICE USE ONLY: Case Number:

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? No Yes
If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? No Yes
If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) A Arise from the same or closely related transactions, happenings, or events; or
 B Call for determination of the same or substantially related or similar questions of law and fact; or
 C For other reasons would entail substantial duplication of labor if heard by different judges; or
 D Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present

IX. VENUE: (When completing the following information, use an additional sheet if necessary)

- (a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides
 Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District: [*]	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles County (CA)	

- (b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides
 Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District: [*]	California County outside of this District; State, if other than California; or Foreign Country
	San Antonio (TX)

- (c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.

Note: In land condemnation cases, use the location of the tract of land involved.

County in this District: [*]	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles County (CA)	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X SIGNATURE OF ATTORNEY (OR PRO PER): _____ Date August 12, 2011

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969 (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))